



OMB No. 2010-0032
Expiration Date 01/31/2010

2007 Performance Track Annual Performance Report

Louisiana Pacific - Middlebury, Indiana A050095

**Year 3 Annual Performance Report
Member Since 2005 (1st Member Term)**

SECTION A: GENERAL FACILITY INFORMATION**A.1 Name of your facility:**

Louisiana Pacific - Middlebury, Indiana

A.2 Name of your parent company:

Louisiana-Pacific Corporation

A.3 Facility contact person for the Performance Track program:

Name: Mr. Tim Keenoy
Title: Plant Environmental Manager
Phone: 574-825-6548
Fax: 574-825-6547
Email: Tim.Keenoy@LPCorp.com

A.4 Facility location:**Facility Address****Street Address:** 219 U.S. Highway 20 West**Address Cont:****City:** Middlebury**State:** IN**Zip Code:** 46540**Mailing Address****Street Address:** P.O Box 509**Address Cont:**

City: Middlebury

State: IN

Zip Code: 46540

If your facility has multiple street addresses, please list any other addresses for its sites or buildings.

A.5 Facility's website address (if any):

<http://www.LPCorp.com> (Corporate website)

A.6 Number of employees (full-time equivalents) who currently work in the facility:

100-499

A.7 For the purposes of where your facility would be listed in our Member Directory, please list the North American Industrial Classification System (NAICS) Code(s) that is (are) used to classify business at the facility:

Primary	Secondary	Tertiary	Quaternary	Quinary
326199				

A.8.a List the activities, products, or services that take place at your facility:

Manufacturer of pre-finished foamed plastic trim moulding. The plastic mouldings are pre-finished alternatives to traditional wood mouldings used around windows, doors and floors.

A.8.b Provide the size and general description of your site:

The plant is about 250,000 square feet in size and is located in an area of farmland and scattered residential housing. The total facility property area is about 35 acres.

A.9 Have the environmental requirements applicable to your facility changed during this reporting period?

No

A.10 Is your facility using any of the following Performance Track regulatory and/or administrative incentives?

RCRA 180 day extension
[PerfTrackExtendedStorage2007.doc](#)

SECTION B: ENVIRONMENTAL MANAGEMENT SYSTEM

B.1.a Is your facility certified to ISO 14001?

No

B.1.b Is your facility's EMS (not your corporate office's EMS) certified to the American Chemistry Council's Responsible Care® program (i.e., has your facility successfully undergone a Responsible Care® third-party audit)?

No

B.2 Performance Track members must have their EMS assessed by an independent party at least once every three years. Please indicate the details of the most recent independent assessment conducted at your facility. If your most recent independent assessment did not cover all EMS elements and business areas, please use the "Add Assessment" button to indicate the additional partial assessments.**Independent EMS Assessment #1****When was this EMS assessment?**

June 2007

What protocol was used?PT Independent Assessment Protocol
Specify:**Who conducted the audit?**Name: Marilyn Rash
Title: Compliance Systems Audit Manager
Organization: Louisiana Pacific Corp.**Which EMS elements were included in the audit?**

Policy, Planning, Implementation, Checking, Management

Did the assessment cover the entire facility or part of the facility?

Entire Facility

Which business areas were included in the audit?**B.3 EPA recommends that Performance Track members conduct an internal EMS assessment every year. Did you conduct one in calendar year 2007?**

No

If not, when is the next audit scheduled?

June 2008

B.4 EPA recommends that Performance Track members conduct a regulatory compliance audit every year. Did your facility conduct any audits in calendar year 2007 to verify compliance with regulatory statutes?

Yes

Regulatory Compliance Audit #1**When was this regulatory compliance audit?**

October 2007

Which regulations were included in the audit?

- Clean Air Act (CAA)
- Clean Water Act (CWA)
- Emergency Planning & Community Right-To-Know Act (EPCRA)
- Resource Conservation and Recovery Act (RCRA)

B.5 Please describe any other audits, inspections, or facility reviews conducted at your facility during the previous three years.

In September, 2007 EPA Region V conducted an unannounced RCRA audit of our facility. No violations were found. In August 2006, a group of personnel from EPA Region V, EPA headquarters and IDEM conducted a Performance Track site visit. In September 2006, an Environmental Compliance Peer Review Audit was conducted by LP corporate staff and two LP plant environmental managers. The Indiana Office of Pollution Prevention and Technical Assistance performs confidential compliance audits annually. The last three of these audits were conducted in November 2005, November 2006 and October 2007. In March 2006, IDEM personnel conducted an unannounced multimedia audit of the plant. No violations were found. In December 2005, the Indiana Clean Manufacturing Technology and Safe Materials Institute audited the plant for pollution prevention opportunities. In December 2005, a self assessment for an EMS gap analysis was conducted by the plant environmental manager.

B.6.a Has your facility corrected all instances of potential non-compliance and EMS non-conformance identified during your audits and other assessments?

Yes

B.6.b Performance Track members should have a Senior Management Review of their EMS every year. Did this review take place in calendar year 2007?

Yes

Who was the senior manager present at the review?

Name: Mr. Jim Kinzler

Title: Plant Manager

B.6.c Performance Track members should conduct a systematic identification and/or review of their environmental aspects at least once every two years. When was your last one conducted?

June 2007

SECTION C: ENVIRONMENTAL PERFORMANCE RESULTS

Goal 1: Louisiana Pacific - Middlebury, Indiana's first goal is to reduce the facility's generation of non-hazardous waste, specifically polystyrene with paper laminate.

C.1.a Briefly describe your activities and achievements related to this goal or, if relevant, any circumstances that delayed progress this year.

In 2007, this project was in the "maintenance phase". We have significantly exceeded our goal.

Activities Conducted During 2006:

We have exceeded our goal. This happened because we worked with our waste hauler to install a lid on

the open top waste hopper (September 2005). This prevents precipitation from wetting the waste which reduced the overall weight of the waste.

Activities Conducted During 2005:

We were able to accomplish the project to reduce the length of the raw trim moulding by one inch. This reduced the end trimming scrap from the off-line paper lamination process which resulted in a decrease of scrap to near the projected level.

C.1.b Describe the data collection process and data source(s) that you used to measure progress towards this goal.

The net weight of the waste in the hopper used for the collection of trimmings from the lamination department is the amount of waste. It is normalized by the amount of production (annual gross lineal footage processed) through the lamination department.

C.1.c Please report your facility's actual performance.

Performance Data					
Waste Management Method	Baseline	Year 1	Year 2	Year 3	Units
	2004	2005	2006	2007	
Landfill	161,232	121,063	111,354	95,557	Pounds

C.1.d Summarized progress toward goal.

Actual Total	Baseline	Year 1	Year 2	Year 3	Perform. Goal	Units
Total Non Hazardous Waste	80.62	60.53	55.68	47.78	n/a	Tons

Normalized Total	Baseline	Year 1	Year 2	Year 3	Perform. Goal	Units
Normalizing Factor	1.0	1.1	1.27	1.19		
Total Non Hazardous Waste	80.62	55.03	43.84	40.15	54.01	Tons
Basis for your Normalizing Factor:	Gross lineal footage processed annually by the lamination department.					

Goal 2: Louisiana Pacific - Middlebury, Indiana's second goal is to reduce the facility's generation of hazardous waste, specifically flammable solids.

C.2.a Briefly describe your activities and achievements related to this goal or, if relevant, any circumstances that delayed progress this year.

This project was completed in 2005 and is now in the "maintenance" phase. The RCRA non-hazardous waste flammable solids waste stream is collected in drums and incinerated. This method of treatment is the best management practice for this waste stream as the facility does not wish to send solvent-contaminated disposables to the local landfill.

Activities Conducted During 2006:

This project was completed in 2005 and is now in the "maintenance" phase.

Activities Conducted During 2005:

The plant's spent solvent hazardous waste used to be an F-listed waste. Items contaminated with the F-listed waste were handled as a hazardous waste. A campaign to reduce the toxicity of the spent solvent was implemented several years ago. When the solvent was reclaimed, a low HAP's solvent was purchased to make up for the reclamation yield loss of about 20%. Over a period of years, the concentration of F-listed constituents in the solvent decreased significantly allowing the F-listing to be dropped. The solids items such as gloves and rags contaminated with the spent solvent were also allowed to drop the F-listing. These materials were then evaluated for hazardous waste characteristics and were found to be RCRA non-hazardous. In 2005, one drum of material was sent out as hazardous waste before the determination was finally completed.

C.2.b Describe the data collection process and data source(s) that you used to measure progress towards this goal.

The amount of hazardous waste flammable solids generated in a year is the waste quantity. It is normalized by the amount of production (annual gross lineal footage processed) from the print department as most of this waste stream is generated by this department.

C.2.c Please report your facility's actual performance.

Performance Data					
Waste Management Method	Baseline	Year 1	Year 2	Year 3	Units
	2004	2005	2006	2007	
Incineration	5,038	458	0.00	0	Pounds

C.2.d Summarized progress toward goal.

Actual Total	Baseline	Year 1	Year 2	Year 3	Perform. Goal	Units
Total Hazardous Waste	2.52	0.23	0.00	0.00	n/a	Tons

Normalized Total	Baseline	Year 1	Year 2	Year 3	Perform. Goal	Units
Normalizing Factor	1.0	.97	0.73	0.56		
Total Hazardous Waste	2.52	0.24	0.00	0.00	0.00	Tons
Basis for your Normalizing Factor:	Annual lineal footage of moulding printed in the print department.					

Goal 3: Louisiana Pacific - Middlebury, Indiana's third goal is to reduce the facility's total (non-transportation) energy use.

C.3.a Briefly describe your activities and achievements related to this goal or, if relevant, any circumstances that delayed progress this year.

We continued to increase our energy reduction practices in the plant. We determined that we did not need to run the dehumidifier(s) in our flowcoat paint department. Lights are now turned off in areas of the plant where people are not routinely present. The light switches in many offices and rest rooms have been replaced with motion detectors. The HVAC in our print/lamination department was again adjusted to reduce heating and cooling requirements. The air handling unit for the maintenance department is turned off during 2nd and 3rd shifts. The setpoints on the thermostats on the plant's space heaters were turned down. We continued to emphasize energy reduction during our environmental training sessions.

Activities Conducted During 2006:

We continue to actively pursue the reduction of energy usage. The drive motors on three extruders were replaced with more energy efficient substitutes. Another section of our roof was renovated with a better insulation rating. The air make-up units have been adjusted to use less outside air resulting in a decreased need to heat the air. T8 fluorescent lamps/fixtures are the new plant standard whenever a fixture is replaced. Reduced energy use is reinforced during environmental training sessions.

Activities Conducted During 2005:

Improved efficiency in the extrusion department (by scheduling longer runs) and a focus on energy reduction consciousness resulted in a decrease in the use of electricity. The usage of natural gas increased due to an increase in the second shift operation resulting in the need to run additional air makeup units. The plant is continuing with the campaign to replace the existing roof with a more energy-efficient roof.

Note: 2004 Natural Gas usage was changed from 15,420 MMBtus to 16,052 MMBtus. The change is to allow the dates of the natural gas bill and monthly heating degree dates to coincide.

C.3.b Describe the data collection process and data source(s) that you used to measure progress towards this goal.

The amount of energy used is the usage of electricity (kwh converted to MMBtu) added to the usage of natural gas (ccf converted to MMBtu). The energy usage is normalized by the amount of production in the extrusion department (annual gross lineal footage extruded) and by the number of heating/cooling degree days.

C.3.c Please report your facility's actual performance.

Energy Generated Off-Site					
	Baseline	Year 1	Year 2	Year 3	
Calendar Year	2004	2005	2006	2007	Units
Electricity Purchased					
Electricity from Grid/Utility	42,197	40,364	39,609	34,492	MMBtus
Electricity from Off-Grid Renewable Sources					
Total Electricity Purchased	42,197.00	40,364.00	39,609.00	34,492.00	MMBtus
If your facility purchases electricity from the grid, please confirm that the electricity geographic region shown below is correct. If incorrect, please contact the Performance Track Information Center. RFC West					
Steam EPA will be determining the greenhouse gases associated with the generation of the steam that you purchase. We will be contacting you for additional information regarding the source of the steam generated.					Btus
Total Energy Generated Off-Site	42,197.00	40,364.00	39,609.00	34,492.00	MMBtus

Calendar Year	Sources of Energy Generated On-Site				Units
	Baseline	Year 1	Year 2	Year 3	
	2004	2005	2006	2007	
Coal					
Natural Gas	16,052	16,434	11,659	10,492	MMBtus
Crude Oil					
Fuel Oil					
Diesel					
Propane/LPG					
Gasoline					
Hydrogen Powered Fuel Cells					
Natural Gas/Methane Powered Fuel Cells					
Biomass					
Biodiesel					
Solar					
Wind					
Landfill Gas					
Geothermal					
Hydroelectric					
Tire Derived Fuel					
Other Fuel or Source Specify:					
Total Energy Generated On-Site	16,052.00	16,434.00	11,659.00	10,492.00	MMBtus

C.3.d Total energy use and associated greenhouse gas emissions.

Actual Energy Use Total	Baseline	Year 1	Year 2	Year 3	Perform. Goal	Units
Total Renewable Energy Use	464.17	444.00	435.70	379.41	n/a	MMBtus
Total Non-Renewable Energy Use	57,784.83	56,354.00	50,832.30	44,604.59	n/a	MMBtus
Total Energy Use	58,249.00	56,798.00	51,268.00	44,984.00	n/a	MMBtus
Metric Tons of CO ₂ Equivalents	9,580.48	9,221.41	8,812.57	7,692.04	n/a	MTCO ₂ E
Metric Tons of CO ₂ Equivalents Offset due to Investments in Green Energy, e.g. green tags						MTCO ₂ E
Net Metric Tons of CO ₂ Equivalents	9,580.48	9,221.41	8,812.57	7,692.04	n/a	MTCO ₂ E

Normalized Energy					Perform.	
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Use Total	Baseline	Year 1	Year 2	Year 3	Goal	Units
Normalizing Factor	1.0	.98	0.933	0.848		
Total Energy Use	58,249.00	57,957.14	54,949.62	53,047.17	56,465.00	MMBtus
Net Metric Tons of CO ₂ Equivalents	9,580.48	9,409.60	9,445.41	9,070.80	9,432.96	MTCO ₂ E
Basis for your Normalizing Factor:	Annual gross footage of moulding extruded adjusted for cooling/heating degree days					

Goal 4: Louisiana Pacific - Middlebury, Indiana's fourth goal is to reduce the facility's VOC emissions.

C.4.a Briefly describe your activities and achievements related to this goal or, if relevant, any circumstances that delayed progress this year.

VOC reductions exceeded our goal due to three factors: we claimed a full year of VOC reduction for our largest volume paint (in 2006 we used this paint for only 1/2 the year), we eliminated the use of a surface primer on some of our paper-laminated mouldings and the production volume of our wet printed mouldings continued to decline (this process has higher VOC emissions per foot of product).

Activities Conducted During 2006:

We have made progress on this goal by approving a replacement paint with lower VOCs for our highest volume paint. We continue to work with suppliers on UV-cured coatings but it is unlikely that this project will be successful in the near future.

Activities Conducted During 2005:

We worked with three different suppliers of UV-cured coatings in 2005. None of them had much success working with our cellular plastic substrate due to the coatings attack on the surface. Two of the suppliers have since dropped the project. We will look for additional suppliers to work on this project. Also, we will try to reduce the amount of VOC's in our largest volume waterbase coatings.

C.4.b Describe the data collection process and data source(s) that you used to measure progress towards this goal.

The amount of volatile organic compounds (VOCs) are tracked and reported as required by the plant's air permit. The total annual emissions of VOCs are normalized by the amount of production in the extrusion department (annual gross lineal footage extruded).

C.4.c Please report your facility's actual performance.

Performance Data						
Calendar Year	Baseline	Year 1	Year 2	Year 3	Perform. Goal	Units
	2004	2005	2006	2007		
Actual Quantity (per year)	20.44	19.40	18.16	12.58	n/a	Tons

C.4.d Normalized progress toward goal.

Normalized Total	Baseline	Year 1	Year 2	Year 3	Perform. Goal	Units

Normalizing Factor	1.0	0.98	0.945	.815		
Normalized Quantity	20.44	19.80	19.22	15.44	18.40	Tons
Basis for your Normalizing Factor:	VOC emissions are fairly equally distributed between three departments: extrusion, flowcoat and print. Thus, annual gross footage of moulding extruded will be the normalizing factor.					

Progress Towards Other Significant Aspects of your EMS

In the table below, please provide a narrative summary of progress made toward EMS objectives and targets other than those reported as Environmental Performance Goals. You may limit the summary to environmental aspects that are significant and towards which progress has been made during the reporting year.

Do you have additional environmental aspects to report? No

SECTION D: PUBLIC OUTREACH AND PERFORMANCE REPORTING

D.1.a Please describe your process to identify potential community environmental concerns.

The plant is a plastics processor (extrusion) with some finishing operations. Because this is a relatively clean industry, environmental concerns are minimal. Reaction to catastrophic events including evacuation of nearby residents are detailed in the plant's hazardous waste contingency plan. Also, potential incidents such as spills which may impact the community are listed in the plant's aspects & impacts analysis. The plant's EMS team includes members from the local community.

D.1.b If you identified community environmental concerns, how did you respond to them?

Environmental SOP 603 was written to insure that bulk truck transfer of solvents to/from storage tanks is performed in the safest possible manner with plant personnel present. The plant's Spill Prevention, Control & Countermeasures plan includes weekly inspection of all tanks and transformers on the property. The plant voluntarily performs an annual wastewater sampling and analysis to insure compliance with the local sewer ordinance.

D.1.c Please describe how you informed the community about environmental matters related to your facility.

The Middlebury Fire Department is given a plant tour every year. The results of the annual wastewater analysis is shared with the superintendent of the local POTW. The plant issues press releases of important environmental events for the plant. In 2007, the commissioner of IDEM visited the plant to acknowledge the plant's acceptance as charter members into the Indiana Environmental Stewardship Program. The plant environmental manager is one of two industry members of the Elkhart County Solid Waste Advisory Committee.

D.2 Please indicate which of the following methods your facility plans to use to make its Performance Track Annual Performance Report available to the public. Please check all that apply.

Press Releases, Building Lobby, Other

Please Specify Other: Copy of 2006 APR in Middlebury Public Library

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SECTION E: SELF-CERTIFICATION OF CONTINUED PROGRAM PARTICIPATION FOR ANNUAL PERFORMANCE REPORT

The U.S. Environmental Protection Agency is not yet in a position to accept electronic signatures and therefore requests a faxed, signed copy of the Section E page. Please complete Section E online, then print Section E using the link on the Overview page. Section E should be signed by the senior manager of your facility and faxed it to the Performance Track Information Center at (617) 354-0463.

On behalf of Louisiana Pacific - Middlebury, Indiana, I certify that:

- I have read and agree to the terms and conditions as specified in the National Environmental Performance Track Program Guide. This facility, to the best of my knowledge, continues to meet all program criteria;
- I have personally examined and am familiar with the information contained in this Annual Performance Report. The information contained in this report is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete;
- My facility has an environmental management system (EMS), as defined in the Performance Track EMS criteria, including systems to maintain compliance with all applicable federal, state, tribal, and local environmental requirements, in place at the facility, and the EMS will be maintained for the duration of the facility's participation in the program;
- My facility has conducted an objective assessment of its compliance with all applicable federal, state, tribal, and local environmental requirements; and the facility has corrected all identified instances of potential or actual noncompliance; and
- Based on the foregoing compliance assessments and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable federal, state, tribal, and local environmental requirements.

I agree that EPA's decision whether to accept participants into or remove them from the National Environment Performance Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision. I am the senior manager with responsibility for the facility and am fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is part of the National Environmental Performance Track program.

Signature/Date:

Name:	Mr. Jim Kinzler
Title:	Plant Manager
Phone Number:	574-825-6501
E-Mail Address:	Jim.Kinzler@LPCorp.com
Facility Name:	Louisiana Pacific - Middlebury, Indiana
Facility Street Address:	219 U.S. Highway 20 West Middlebury, IN 46540
Mailing Address:	P.O. Box 509 Middlebury, IN 46540
Performance Track ID#:	A050095